

# **EXHIBIT 3**



# MICHIGAN COUNCIL 25

American Federation of State, County, and Municipal Employees, AFL-CIO  
 Detroit Office • 600 W. Lafayette, Ste. 500 • Detroit, Michigan 48226  
 Phone: 313.964.1711 • 1.800.AFSCME25 • Fax: 313.964.0230 • www.miafscme.org

Albert Garrett  
 President  
 Lawrence A. Roehrig  
 Secretary-Treasurer  
 Executive Board  
 Doreen Austin  
 Region 2  
 Carlos Bass  
 Region 3  
 David Brandt  
 Region 9  
 Donna Cangemi  
 Region 3  
 Susan Christensen  
 Region 11  
 Sandra Crayton  
 Region 6  
 Barbara Dauble  
 Region 3  
 Anna Davison  
 Region 2  
 Nathan Drake  
 Region 2  
 Rynette Fenner  
 Region 4  
 Michael Harris  
 Region 1  
 Annette Henley  
 Region 1  
 Elaine Jacobson  
 Region 10  
 John January  
 Region 1  
 Ira Kinch  
 Region 6  
 Sean King  
 Region 1  
 Neil McGuire  
 Region 2  
 Ellis McMillon  
 Region 1  
 Chris Moore  
 Region 7  
 Tim Muma  
 Region 6  
 Greg Murch  
 Region 5  
 Tim Murray  
 Region 3  
 Shanie Nahas  
 Region 3  
 Chris Overmyer  
 Region 7  
 Lisa Peterson  
 Region 4  
 Licia Ramirez  
 Region 6  
 Les Rhodes, Jr.  
 Region 5  
 Greg Rice  
 Region 1  
 Mike Skorupski  
 Region 8  
 Jay Spurlock  
 Region 2  
 Chris Van der Bussche  
 Region 7  
 ...

June 3, 2013

## Hand Delivered

Ruth Anne Okun, Director  
 Bureau of Employment Relations  
 Cadillac Place  
 3026 W. Grand Blvd. Suite 2-750  
 P.O. Box 02988  
 Detroit, MI 48202-2988

Re: Petition for ACT 312 Arbitration for:  
 City of Detroit –and- Michigan AFSCME Council 25 – Local 1023  
 Case #: D13 C-0331

Dear Ms. Okun:

Enclosed for filing please find enclosed the following documents pertaining to the above referenced matter:

1. An Original and (3) three copies of Local 1023's Petition for Act 312 Arbitration
2. Proof of Service
3. A copy of the most recent labor agreement between the parties

Very truly yours,

*Shawntane Williams*

Shawntane Williams (P72828)  
 Counsel for Petitioner

Enclosures

Copy: Delia Enright, President for Local 1023  
 Catherine Phillips – Staff Representative  
 Kevin Orr, Emergency Manager Hand Delivered June 3, 2013  
 Lamont Satchel – Labor Relations Director Hand Delivered June 3, 2013  
 Lansing Master File – L3222-1023-2013

Sq324uocafscio revised060313

RECEIVED  
 2013 JUN -3 PM 2:34  
 STATE OF MICHIGAN  
 EMPLOYMENT RELATIONS COMM.  
 DETROIT OFFICE

COPY



PETITION FOR ACT 312 ARBITRATION  
EMPLOYMENT RELATIONS COMMISSION  
Michigan Department of Licensing and Regulatory Affairs

AUTHORITY: P.A. 312 of 1969, as amended  
COMPLETION: MANDATORY  
PENALTY: CASE WILL NOT BE  
PROCESSED WITHOUT USE  
AND COMPLETION OF THIS  
FORM

MEDIATION CASE NO:			MEDIATOR:		
1. PUBLIC EMPLOYER NAME City of Detroit Labor Relations			EMPLOYER CONTACT/REPRESENTATIVE NAME: Kevin Orr, Emergency Manager and Lamont Satchel, Labor Relations Director		
ADDRESS (STREET NO. & NAME) 2 Woodward Ave., Suite 332			ADDRESS (STREET NO. & NAME) 2 Woodward Ave., Suite 1126		
CITY Detroit	STATE Michigan	ZIP CODE 48226	CITY Detroit	STATE Michigan	ZIP CODE 48226
TELEPHONE WITH AREA CODE 313-224-3860	FAX NO. 313-224-0738	E-MAIL	TELEPHONE WITH AREA CODE 313-224-3400	FAX NO. 313-224-4433	E-MAIL
2. LABOR ORGANIZATION NAME Michigan AFSCME Council 25 - Local 1023			LABOR CONTACT/REPRESENTATIVE NAME: Shawntane Williams, Staff Attorney		
ADDRESS (STREET NO. & NAME) 600 W. Lafayette Blvd., Suite 500			ADDRESS (STREET NO. & NAME) 600 W. Lafayette Blvd., Suite 500		
CITY Detroit	STATE Michigan	ZIP CODE 48226	CITY Detroit	STATE Michigan	ZIP CODE 48226
TELEPHONE WITH AREA CODE 313-964-1711	FAX NO. 313-964-0230	E-MAIL	TELEPHONE WITH AREA CODE 313-964-1711 ext. 2263	FAX NO. 313-964-0230	E-MAIL swilliams@miafscme.org
PURSUANT TO RULE 423.505, THE FOLLOWING DOCUMENTS MUST BE ATTACHED TO THIS PETITION: <input checked="" type="checkbox"/> A COPY OF THE MOST RECENT LABOR AGREEMENT BETWEEN THE PARTIES <input type="checkbox"/> THE ISSUES HAVE BEEN IDENTIFIED AS EITHER ECONOMIC OR NON-ECONOMIC <input type="checkbox"/> A COPY OF THE ISSUES IN DISPUTE					
THIS PETITION IS FILED BY: <input type="checkbox"/> EMPLOYER <input checked="" type="checkbox"/> UNION					
DATE MEDIATION REQUESTED: March 12, 2013			DATES AND TIMES OF MEDIATION MEETINGS: Employer has refused to bargain or participate in Mediation		
UNIT DESCRIPTION: Local 1023 Emergency Service Operators					
NO. OF EMPLOYEES IN UNIT: 90			CONTRACT EXPIRATION DATE: 6/30/13		

RECEIVED  
2013 JUN -3 PM 2:34  
DETROIT  
MICHIGAN  
DEPT. OF LICENSING & REG. AFFAIRS

THE PETITIONER HAS ENGAGED IN GOOD FAITH BARGAINING AND MEDIATION, AND THE PARTIES HAVE NOT SUCCEEDED IN RESOLVING THE DISPUTED MATTERS.

I HAVE READ THE ABOVE PETITION AND THE STATEMENTS THEREIN ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Shawntane Williams, Staff Attorney

PRINT NAME/TITLE

6/3/13

DATE

Shawntane Williams  
SIGNATURE

COPY

SERVE ORIGINAL PETITION ON THE OTHER PARTY OR ITS REPRESENTATIVE AND FILE THREE COPIES AND A PROOF OF SERVICE WITH THE COMMISSION. ALSO ATTACH A COPY OF THE DOCUMENTS DESCRIBED ABOVE.

The Department of Licensing and Regulatory Affairs will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, handicap or political beliefs.

OFFICE USE ONLY:	Date Petition Received:	Date Panel Issued:	Date of Last Best Offer:	Date of Hearing:	Date of Final Award:
------------------	-------------------------	--------------------	--------------------------	------------------	----------------------

rev 02/13

STATE OF MICHIGAN  
EMPLOYMENT RELATIONS COMMISSION  
LABOR RELATIONS DIVISION

In the Matter of:

CITY OF DETROIT

Respondent - Public Employer,

Petition for Act 312 Arbitration  
Case #: D13 C-0331

-and-

AMERICAN FEDERATION OF STATE,  
COUNTY AND MUNICIPAL EMPLOYEES,  
MICHIGAN COUNCIL 25, LOCAL 1023

Petition - Labor Organization.

---

PROOF OF SERVICE

I HEREBY CERTIFY that I served by hand delivery, a copy of Petitioner's Petition for Act 312 Arbitration and a copy of this proof of service upon:

City of Detroit  
Attn: Kevin Orr  
2 Woodward Ave., Suite 1126  
Detroit, MI 48226

City of Detroit Labor Relations Department  
Attn: Lamont Satchel, Labor Relations Director  
2 Woodward Ave., Suite 332  
Detroit, MI 48226

STATE OF MICHIGAN  
EMPLOYMENT RELATIONS COM.  
DETROIT OFFICE

2013 JUN -3 PM 2:54

RECEIVED

I declare that the statements above are true to the best of my information, knowledge, and belief.

Dated: June 3, 2013

By:   
Support Staff